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14	UNITED STATES BANKRUPTCY COURT	
15	NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION	
16		LG N 10 20000 (DM)
17		Case No. 19-30088 (DM)
18	In re:	Chapter 11
19	PG&E CORPORATION,	(Lead Case) (Jointly Administered)
20	- and -	REQUEST FOR ENTRY OF ORDER BY
21	PACIFIC GAS AND ELECTRIC COMPANY,	DEFAULT ON MOTION FOR ENTRY OF AN ORDER FURTHER EXTENDING
22	Debtors.	DEADLINE FOR THE REORGANIZED DEBTORS TO OBJECT TO CLAIMS AND
23	☐ Affects PG&E Corporation	FOR RELATED RELIEF
24	☐ Affects Pacific Gas and Electric Company	[Re: Docket No. 14609]
25	✓ Affects both Debtors	
26	* ALL PAPERS SHALL BE FILED IN THE LEAD CASE, NO. 19-30088 (DM).	
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REQUEST FOR ENTRY OF ORDER BY DEFAULT

PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively, the "Debtors" or the "Reorganized Debtors") in the above-captioned chapter 11 cases (the "Chapter 11 Cases") hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, as made applicable to these Chapter 11 Cases by the Second Amended Order Implementing Certain Notice and Case Management Procedures entered on May 14, 2019 [Docket No. 1996] ("Case Management Order"), that the Court enter by default an order, after review of the merits, approving the relief sought in the Motion for Entry of an Order Further Extending Deadline for the Reorganized Debtors to Object to Claims and for Related Relief filed by the Reorganized Debtors on October 15, 2024 [Docket No. 14609] (the "Motion").

RELIEF REQUESTED IN THE MOTION

The Motion seeks entry of an order: (i) further extending the deadline established under the Plan for the Reorganized Debtors to object to General Claims by an additional one hundred eighty (180) days, through and including June 16, 2025, without prejudice to the Reorganized Debtors' right to seek additional extensions thereof; and (ii) granting related relief. A proposed order (the "**Proposed Order**") was attached as Exhibit A to the Motion.

NOTICE AND SERVICE

A notice of hearing on the Motion was filed on October 15, 2024 [Docket No. 14611] (the "Notice of Hearing"). The Motion, the Notice of Hearing, and the supporting declaration of Robb C. McWilliams [Docket No. 14610] were served as described in the Certificate of Service of Melissa Diaz, filed on October 23, 2024 [Docket No. 14617]. The deadline to file responses or oppositions to the Motion has passed, and no responses or oppositions have been filed with the Court or received by counsel for the Reorganized Debtors.

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¹ Capitalized terms not herein defined shall have the meanings given to them in the Motion.

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that:

- 1. I am an attorney with the firm of Keller Benvenutti Kim LLP, co-counsel for the Reorganized Debtors.
- 2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no response or opposition has been filed with respect to the Motion. I am also not aware of any informal objection or response to the Motion.
 - 3. This declaration was executed in San Francisco, California.

WHEREFORE, the Reorganized Debtors hereby request entry of the Proposed Order, granting the Motion as set forth therein.

Dated: October 30, 2024

WEIL, GOTSHAL & MANGES LLP KELLER BENVENUTTI KIM LLP

/s/ Dara L. Silveira
Dara L. Silveira

Attorneys for Debtors and Reorganized Debtors

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